



Anne E. Campbell • County Superintendent of Schools

September 16, 2013

Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554  
September 10, 2013

Dear Sir/Madame,

I am writing today in response to the FCC's Notice of Proposed Rulemaking (NPRM), which among other things, proposes changes to the E-Rate program. I would first like to thank the FCC for its continued support of the E-Rate program. This program provides critical discounts to assist educational organizations in obtaining affordable telecommunications services and Internet access.

The E-Rate Program is succeeding in this mission. As the FCC moves forward with this NPRM, it is prudent to remain focused on the fact that E-Rate is a program that works and that any changes to the program should be focused on expanding a successful program that has yet to reach its full potential.

The E-Rate Program, with some relatively minor modifications, can be the most effective tool employed to help our nation reach President Obama's goals as delineated in his ConnectEd K-12 Broadband Initiative. With four overall adjustments, I believe this objective can be met.

The first and most important modification I recommend the FCC makes to the E-Rate Program is to increase annual funding of this program to \$4.5 billion permanently, with an ongoing adjustment for inflation. Currently, the funding is capped at just over \$2.3 billion of the Universal Service Fund. This amount had remained frozen since the program's inception in 1998 at \$2.25 billion until 2011, when the program received a slight inflationary adjustment. Every year, schools and libraries apply for E-Rate discounts that far exceed the available funding. By increasing the funding amount to \$4.5 billion, with adjustments for inflation, more schools and libraries will receive these much-needed discounts to continue enhancing their network connectivity to meet the needs of our nation's students.

Secondly, I recommend the FCC restores the original technology-neutral E-Rate framework by removing the priority system funding cap. By restoring technology-neutral funding priorities, applicants will have the flexibility to choose the most cost-effective solutions that will meet their unique, local needs.

My third recommendation is that the FCC places reasonable limits on the annual amount of E-Rate discounts available to any single applicant. By placing limits on the total discounts available to individual applicants, the FCC will be encouraging thoughtful, cost-effective decision making. Overall funding shortages will decrease, and E-Rate discounts can be applied more effectively to the eligible goods and services that each applicant needs the most.

My final recommendation is that the E-Rate application process be streamlined. Currently, an applicant must complete six different forms every year for each good or service applied for. In addition, time must be spent every year in staff receiving training to learn and understand the changes to the program from the prior year. The countless hours involved in this work has forced some organizations, like mine, to incur the additional expense of consultants who have acquired expertise in navigating the E-Rate application process. Simplification of this process could significantly ease the administrative burden applicants currently face.

In conclusion, I wish to thank you for considering my response as you move forward with your decision on the E-Rate Program. I applaud the FCC for its continued support of the E-Rate Program and I appreciate the opportunity to submit my input regarding how this program can be modified to provide even more of its vital services to the students of our nation.

Sincerely,

A handwritten signature in blue ink, appearing to read "AEC", followed by a stylized surname that looks like "Campbell".

Anne E. Campbell  
Superintendent